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C2 EDUCATIONAL SYSTEMS, INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

C2 EDUCATIONAL SYSTEMS, INC.,

Plaintiff,

v.

SUNNY LEE, KYUNG HYE DEBBIE  
HONG and SO YEON JANG,

Defendants.

Case No. 3:18-02920-JSC

**[PROPOSED] ORDER RE PLAINTIFF'S *EX PARTE* APPLICATION FOR TEMPORARY  
RESTRAINING ORDER AND ORDER TO  
SHOW CAUSE WHY A PRELIMINARY  
INJUNCTION SHOULD NOT BE ISSUED**

Complaint Filed: May 17, 2018  
Trial Date:

**ORDER**

Having read Plaintiff's *EX PARTE* APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT BE ISSUED, and good cause appearing, the Court orders the following temporary relief, pending a hearing on C2's motion for preliminary injunction:

Defendants, within 24 hours of receipt of this Court's order, are to return to C2 any and all documents and information, in whatever form, including, but not limited to, any computer disks or hard drives that contain information pertaining to C2's customers, services, prices, operations, or financial records, or related information, including any and all copies or derivatives thereof;

Defendants Lee and Jang are to immediately return to C2 all of C2's property including but not limited to C2's hard copy files, 13" MacBook Air purchased for Jang's use on or about August 28, 2014, and laptop computer serial number CND22929DW purchased in or about January 2013 for Lee's use;

Each Defendant is to immediately to produce to counsel for C2 for inspection each Defendant's personal and work email account(s), servers, hard drives, computer(s), mobile devices, PDAs, USB drives and other computer equipment utilized by any Defendant, either individually or on behalf of Core Academics, during the period September 1, 2017 to the present, including any hosted equipment, by a forensic computer expert to ensure that none of C2's confidential information, trade secrets, or other data or information, including its leads, customer list, curriculum, or financial information, exists on such devices. The forensic examination will be carried out by an independent examiner who is not an employee of C2;

Each Defendant is to immediately return to C2 all documents (including duplicates) in her possession and/or in the possession of any of her representatives, agents, employees and/or persons acting in concert with her that contain any confidential information acquired by any Defendant from or through C2;

Each Defendant is to identify any Internet, Cloud-based or Web-based site which she has used since September 1, 2017, and provide sufficient identifying information about the nature and use of the site for a third party subpoena to issue, where any C2's data and/or information has been

1 transferred, stored or kept by any Defendant at any time;

2 Each Defendant is to provide access to the forensic examiner referenced in (c) above to  
3 each and every email account each Defendant has used since September 1, 2017, including  
4 authorizing the email hosts (Gmail, Yahoo, hotmail, and the like) to provide all data from their  
5 servers so that such email accounts may be imaged and examined by a computer forensic examiner  
6 to preserve evidence that may be contained therein. The forensic examination will be carried out by  
7 an independent examiner who is not an employee of C2;

8 Each Defendant is to preserve all evidence until such time as the Court has had the  
9 opportunity to hear the merits of this case; and

10 Each Defendant is to provide a Declaration to the Court that she has complied with the  
11 obligations set forth above.

12 The hearing on the motion for preliminary injunction is hereby set for \_\_\_\_\_,  
13 2018 at \_\_\_\_m., C2 may file and serve, by facsimile, email or personal delivery, any additional  
14 moving papers by \_\_\_\_\_, 2018; Defendants, and each of them, may file and serve, by  
15 facsimile, email or personal delivery, opposition papers by \_\_\_\_\_, 2018; and C2 may  
16 file and serve, by facsimile, email or personal delivery, reply papers by \_\_\_\_\_, 2018.

17 **IT IS SO ORDERED.**

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21 DATED: \_\_\_\_\_, 2018  
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\_\_\_\_\_  
24 U.S. District Judge  
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